

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In Re:

KENNETH LAWRENCE GROVER,

Debtors.

Case No. 23-40497-BDL

EX PARTE APPLICATION BY
UNITED STATES TRUSTEE FOR *EX*
PARTE ORDER DIRECTING (1) FED.
R. BANKR. P. 2004 EXAMINATION
OF DEBTORS; AND (2)
PRODUCTION OF DOCUMENTS

Acting United States Trustee for Region 18, Gregory M. Garvin (the “U.S. Trustee”), moves the Court pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (“Fed. R. Bankr. P.”) for an ex parte order authorizing the U.S. Trustee to issue subpoenas pursuant to Fed. R. Bankr. P. 9016 to be set on at least 10-days’ notice, directing Kenneth Lawrence Grover (the “Debtor”) to (1) to appear and be examined under oath and (2) produce documents, at such times and dates as to be set in the subpoenas, and on not fewer than 10-days’ notice. The examination shall continue from the time and date set thereafter day-to-day until it is completed, excluding weekends and holidays. The testimony will be recorded stenographically, through audiovisual means, and/or digitally recorded. The U.S. Trustee requests permission to conduct the examination through Zoom or another online video conferencing platform rather than in person if agreed upon.

The U.S. Trustee believes inquiry into the Debtor’s assets and prepetition transactions is

1 warranted in this case and that the examination and documents requested hereby are necessary
2 for the U.S. Trustee to properly perform his statutory duties in this case.

3 WHEREFORE, the U.S. Trustee respectfully requests that the Court enter an order:

- 4 A. Approving this Application; and
5 B. Authorizing the U.S. Trustee to issue subpoenas to the Debtor directing them to
6 produce documents and appear for examination under oath, pursuant Fed. R. Civ. P.
7 2004 and 9016;
8 C. Allowing any oral examination of the Debtor under oath to proceed remotely,
9 through an online video-conference platform; and
10 D. Granting such other and further relief that the Court deems appropriate.

11 DATED this 12th day of May, 2023

12 Respectfully submitted,

13 GREGORY M. GARVIN
14 Acting U.S. Trustee for Region 18

15 /s/ Matthew J.P. Johnson
16 Matthew J.P. Johnson, WSBA #40476
17 Attorney for United States Trustee
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